



STATE OF WASHINGTON
DEPARTMENT OF COMMERCE
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October 8, 2026

The Honorable Steve Hogan
c/o Alan Peters, Community Development Director
City of Camas
616 NE 4th Ave
Camas, WA 98607

Sent Via Electronic Mail: apeters@cityofcamas.us

Re: 2026-S-15224 60-day Notice of Intent to Adopt - Periodic Update to the Camas Comprehensive Plan and Development Regulations.

Dear Mayor Hogan:

Thank you for the opportunity to review and comment on the Camas draft comprehensive plan and development regulations. We appreciate the ongoing coordination with our agency as you work to achieve the community's vision consistent with the goals and requirements of the Growth Management Act (GMA). Growth Management Services received the proposed amendment on August 14, 2026, and processed it with material identification number 2026-S-15224.

Your submission represents a great deal of work towards the 2025 periodic update of your comprehensive plan and implementing development regulations, which were due December 31, 2025.

We have reviewed your submittal using Commerce's [Periodic Update Checklist](#) and [Expanded Housing Checklist](#). We encourage you and your community to consider the following as you finalize your drafts prior to adoption:

Comprehensive Plan

Land Use Element

1. In our review, we did not find identification of lands useful for public purposes such as utility corridors, transportation corridors, landfills, sewage treatment facilities, storm water management facilities, recreation, schools and other public uses. We did find a policy associated with this, but not specific identification of lands useful for these purposes. We recommend updating the proposed policies and regulations to be consistent with [RCW 36.70A.150](#) and [WAC 365-196-340](#)

2. During our review, we did not find identification of open space corridors and green spaces within and between urban growth areas including lands useful for recreation, wildlife habitat, trails and connections of critical areas, and urban and community forests within the UGA. We recommend updating the proposed policies and regulations to be consistent with [RCW 36.70A.070\(1\)](#) amended in 2023, [RCW 36.70A.160](#) and [WAC 365-196-335](#).
3. Based on our review, we did not find special consideration to achieving environmental justice in goals and policies, including efforts to avoid creating or worsening environmental health disparities. We recommend updating the proposed policies and regulations to be consistent with [RCW 36.70A.070\(1\)](#).
4. Upon review, we did not find where the land use element reduces and mitigates the risk to lives and property posed by wildfires by using land use planning tools and through wildfire preparedness and fire adaption measures. We recommend updating the proposed policies and regulations to be consistent with [RCW 36.70A.070\(1\)](#). See also: [International Wildland-Urban Interface Code](#) and [WAC 51-55](#).

Capital Facilities Element

5. In our review, we did not find a forecast of future need. Sometimes this information is located in a capital facilities plan, but that plan was not submitted and could not be found on the city's website. We recommend updating the proposed policies and regulations to be consistent with [RCW 36.70A.070\(3\)\(b\)](#) and [WAC 365-196-415\(1\)\(b\)](#). Please note that the forecast should be based on projected population, housing units, and adopted levels of service (LOS) over the planning period.
6. During our review, we did not find proposed locations and capacities of expanded or new capital facilities. Sometimes this information is located in a capital facilities plan, but that plan was not submitted and could not be found on the city's website. We recommend updating the proposed policies and regulations to be consistent with [RCW 36.70A.070\(3\)\(c\)](#) and [WAC 365-196-415\(1\)\(c\) and \(3\)\(c\)](#). Please note, infrastructure investments should consider equity and plan for any potential displacement impacts.
7. Based on our review, we did not find a policy or procedure to reassess the land use element if probable funding falls short of meeting existing needs. We recommend updating the proposed policies and regulations to be consistent with [RCW 36.70A.070\(3\)\(e\)](#), [WAC 365-196-415\(2\)\(d\)](#).

Housing Element

8. Upon review, we were unable to identify which set of actions the city intends to implement to meet requirements of RCW 36.70A.070(2)(d). To better align with this requirement, we recommend adding to the housing element a list of barriers to affordable housing needs and actions needed to remove those barriers to align with statute. Guidance on completing this requirement can be found in chapter 4 of [Guidance for Updating Your Housing Element](#) (pg. 52-68).

Based on recent Growth Management Hearings Board cases, we also recommend identifying gaps in local funding needed to achieve affordable housing needs, documenting which available local funding tools or incentives are already being used, and which tools can be implemented to help close the funding gap. Guidance on this can be found in chapter 4 of [Guidance for Updating Your Housing Element](#) (pg. 60-62) and Appendix B: Adequate provisions checklist.

9. In our review, we were unable to find discussion of how the city's housing policies were evaluated for racially disparate impacts, displacement, and exclusion in housing, as required by [RCW 36.70A.070\(e\)](#). We recommend including this evaluation in the city's housing element or

as an appendix in the comprehensive plan. For guidance on completing this requirement, please see [Guidance to Address Racially Disparate Impacts](#).

10. Results of the land capacity analysis are included in the housing element on pg. 44-50. To better align with requirements of [RCW 36.70A.070\(2\)\(c\)](#), we suggest disaggregating housing needs and capacity below 80% AMI (Table 4) to reflect the differing affordability levels that allowed housing types may reach. For example, capacity for ADUs in all zones is counted toward needs for all income levels below 80% AMI (Table 5), although ADUs typically do not reach the lowest levels of affordability (0-30% AMI).

Transportation Element

11. During our review, we did not find identification of specific actions to bring transportation facilities and services to established multimodal LOS. We recommend updating the proposed policies and regulations to be consistent with [RCW 36.70A.070\(6\)\(a\)\(iii\)\(D\)](#) amended in 2023, [WAC 365-196-430](#).
12. Based on our review, we did not find an analysis of future funding capability to judge needs against probable funding resources. We recommend updating the proposed policies and regulations to be consistent with [RCW 36.70A.070\(6\)\(a\)\(iv\)\(A\)](#), [WAC 365.196-430\(2\)\(k\)\(iv\)](#).

Climate Element

13. The climate element includes a thoughtful write up about overburdened communities and vulnerable populations and adds additional areas that are most vulnerable to climate hazards. This section references the Camas 2045 Equity Framework in the introduction section, but we did not see this section in the comprehensive plan. We suggest adding this section if it was left out or revising the reference to point to a specific page number if it is in the comprehensive plan already.
14. Although there is a section about overburdened communities and vulnerable populations in the climate element, it is not clear how the climate policies that benefit overburdened communities and vulnerable populations were prioritized. Policies CL-6.5, CL-4.1, CC-3.1, LU-1.4 are a good start. To strengthen these policies, we suggest including a brief explanation of how they prioritize overburdened communities and vulnerable populations and how they will be implemented.
15. Some climate policies describe aspirations for climate resiliency and mitigation but are ultimately vague such as CL-1.1 “Support residents’ efforts to improve energy efficiency and resiliency in existing and new residences” or Policy PFS-4.23 “Protect natural stream courses for water quality.” Refining policies to include how they will be implemented could strengthen the policies and more clearly meet the intention of [RCW 36.70A.070\(9\)](#).

Development Regulations

STEP Housing

16. Based on our review of the city’s current zoning regulations, we could not find definitions for emergency housing or emergency shelters. We recommend including these definitions in the city’s development regulations consistent with language found in [RCW 36.70A.030](#).
17. In our review, we could not find a definition for religious organization. We recommend including this definition in the city’s development regulations consistent with language found in [RCW 36.01.290](#).

18. During our review, we were unable to find where emergency housing and shelter are allowed in the city. For consistency with [RCW 35A.21.430](#) and [RCW 36.70A.070\(2\)\(c\)](#), we recommend updating your code to reflect that these housing types are allowed in all areas that allow hotels.

Co-Living

19. In our review of the city's current zoning regulations, we did not see where the city allows co-living as a permitted use on any lot located within an urban growth area that allows at least six multifamily residential units, including lots zoned for mixed-use development. We recommend updating proposed regulations to be consistent with [RCW 36.70A.535](#).

Residential Parking

20. In our review of the parking standards in the Camas code, we did not find amendments to residential parking regulations that are consistent with [RCW 36.70A.622](#). For consistency with statute, we recommend incorporating the provisions outlined in RCW 36.70A.622.

Construction Flexibility

21. In our review, we found that the height and setback standards outlined in the Camas code did not include provisions that would allow for the following flexibility:

- o Allow for new construction or retrofits of existing buildings for residential housing to project into required setbacks and exceed height limits by up to eight inches to accommodate the addition of necessary insulation.
- o Allow for buildings that meet passive house requirements to project into required setbacks and exceed height limits by up to eight inches to accommodate the addition of necessary insulation.
- o Measure gross floor area from the interior face of the exterior wall.
- o Allow a building to exceed maximum roof height limits by at least 48 inches to accommodate a roof-mounted solar energy system.

For consistency with [RCW 36.70A.810](#), [.812](#), and [.813](#), we recommend incorporating the ability to exceed height and setback standards in the above cases.

Finally, as a friendly reminder, copies of adopted plans and development regulations must be submitted to Commerce within ten days after final adoption (RCW 36.70A.106(2)).

Again, we appreciate the work your proposed amendments represent, and we wish you success in meeting the goals of the Growth Management Act. We are available for technical assistance. If you wish to discuss these comments, you may reach me at ted.vanegas@commerce.wa.gov or 360-280-0320.

Sincerely,

Ted Vanegas

Ted Vanegas
Senior Planner
Growth Management Services

cc: David Andersen, AICP, Managing Director, Growth Management Services
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